

LINCOLN OFFICE
SUITE 500
301 SOUTH 13TH STREET
LINCOLN, NEBRASKA 68508-2578
TELEPHONE 402-437-8500
FAX 402-437-8558

WOODS & AITKEN
L * L * P

DENVER OFFICE
SUITE 525
8055 EAST TUFTS AVENUE
DENVER, COLORADO 80237-2835
TELEPHONE 303-606-6700
FAX 303-606-6701

OMAHA OFFICE
SUITE 525
10250 REGENCY CIRCLE
OMAHA, NEBRASKA 68114-3754
TELEPHONE 402-898-7400
FAX 402-898-7401

THOMAS J. MOORMAN
DIRECT: (202) 944-9502
EMAIL: TMOORMAN@WOODSAITKEN.COM
WWW.WOODSAITKEN.COM
ADMITTED TO PRACTICE ONLY IN THE DISTRICT OF COLUMBIA

WASHINGTON OFFICE
SUITE 310
5151 WISCONSIN AVENUE, N.W.
WASHINGTON, D.C. 20016-4124
TELEPHONE 202-944-9500
FAX 202-944-9501

PLEASE RESPOND TO WASHINGTON ADDRESS

June 27, 2016

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

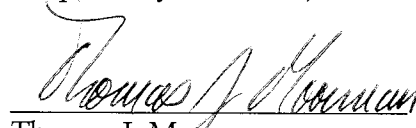
**Re: WC Docket No. 14-58
Submission of Redacted Version of FCC Form 481 for
Curtis Telephone Company (Study Area Code 371536)**

Dear Ms. Dortch:

Attached for electronic filing is a copy of the redacted public version of (1) the FCC Form 481 of Curtis Telephone Company (the “Company”) which contains the Company’s financial information of required by Section 54.313(f)(2) of the Commission’s Rules (which is filed in compliance with the Protective Order referenced below); (2) the Company’s updated five-year plan required by Section 54.313 of the Commission’s Rules; and (3) Network Outage Information.

The Company’s FCC Form 481 has been electronically filed with the Universal Service Administrative Company. Consistent with the Commission’s Protective Order, WC Docket No. 10-90 *et al.*, DA 16-296, released March 22, 2016 and 47 C.F.R. § 0.459 of the Commission’s Rules, the Company, under separate letter, has submitted the confidential version of the Company’s FCC Form 481 which contains the Company’s financial information required by Section 54.313(f)(2) of the Commission’s Rules and the Company’s updated five-year plan and network outage information.

Respectfully submitted,



Thomas J. Moorman
James A. Overcash
Counsel to Curtis Telephone Company

Attachment

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FAX 402-437-8558

WOODS & AITKEN
L • L • P

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DENVER, COLORADO 80237-2835
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TELEPHONE 202-944-9500
FAX 202-944-9501

PLEASE RESPOND TO WASHINGTON ADDRESS

***CONFIDENTIAL INFORMATION — SUBJECT TO PROTECTIVE ORDER BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION***

AND

***CONFIDENTIAL INFORMATION FILED PURSUANT TO SECTION 0.459 OF THE
COMMISSION'S RULES***

June 27, 2016

HAND DELIVERED

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 14-58

**Submission of Confidential Version of FCC Form 481
Curtis Telephone Company (Study Area Code 371536)**

Dear Ms. Dortch:

Pursuant the requirements of the Commission's Protective Order, WC Docket No. 10-90 *et al.*, DA 16-296, released March 22, 2016 (the "Protective Order") and 47 C.F.R. § 0.459 of the Commission's Rules, attached for filing is one copy of the confidential version of the FCC Form 481 of Curtis Telephone Company (the "Company") which contains the Company's financial information required by Section 54.313(f)(2) of the Commission's rules (which is filed in compliance with the Protective Order), and the Company's Annual Progress Report to its five-year plan (the "Progress Report")¹ required by Section 54.313(a)(1) of the Commission's Rules

¹ The Company notes that this Annual Progress Report is required until certain rule changes by the Federal Communications Commission (the "Commission" or the "FCC") associated with reporting geocoded locations are approved by the Office of Management and Budget. *See In the Matter of Connect America Fund, et al., Report and Order and Order on Reconsideration, and Further*

Ms. Marlene H. Dortch, Secretary
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Page 2

and Network Outage Information required by Section 54.313(a)(2) of the Commission's Rules (which is filed pursuant to the requirements of Section 0.459 of the Commission's Rules).

The Company's FCC Form 481 has been electronically filed with the Universal Service Administrative Company on June 15, 2016. Consistent with the Protective Order and Section 0.459, the Company is submitting separately the public version of the Company's FCC Form 481 which redacts the confidential information from the submission the Company's Section 54.313(f)(2) financial information and the Company's confidential information contained in the Progress Report (the "Progress Report Information") and the Network Outage Information.

Section 54.313(f)(2) Financial Information

In the Protective Order, the Commission established procedures for the submission of the financial information required by Section 54.313(f)(2) of the Commission's Rules. The Protective Order establishes the procedures under which such submission can be made. The Company respectfully submits that, in good faith, those procedural requirements (which include copies and specific page headers) have been followed. Thus, under the Protective Order, the Company respectfully requests that its Section 54.313(f)(2) information be kept confidential.

Sections 54.313(a)(1) Progress Report to Its Five-Year Plan and Section 54.313(a)(2) Network Outage Information

In addition to its submission of Section 54.313(f)(2) information for which it seeks confidential treatment, this letter also submits the Company's Progress Report as part of its 2016 FCC Form 481 submission to its initial five year construction and service improvement plan submitted by the Company last year.² Further, as part of its 2016 FCC Form 481 Submission, the Company also seeks confidential treatment of its Network Outage Information submission.

Pursuant to 47 C.F.R. § 0.459 of the Commission's Rules, the Company, by Counsel, hereby requests that the identified portion of the Progress Report Information and the Network Outage Information as noted in sub-section (1), below, be withheld from public inspection. Specifically, the Company requests that information attached hereto and as required to be submitted in order to be fully responsive to the requirements found in 47 C.F.R. §§ 54.313(a)(1) and 54.313(a)(2) be withheld from public inspection because that information contains trade

Notice of Proposed Rulemaking, WC Docket Nos. 10-90 *et al.*, FCC 16-33, released March 30, 2016 at paras. 215-216.

² Accompanying this letter is the Declaration of Wendy Thompson Fast, President of the Company certifying to the facts stated in this request.

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secrets and, as applicable, commercial, financial, and technical data that is guarded from disclosure to competitors and the public in the normal and ordinary course of business.

The Commission requires certain Eligible Telecommunications Carriers (“ETCs”) to file a five-year service quality improvement plan and Section 54.313(a)(1) then requires an ETC to provide progress reports regarding that plan over the course of the five years. Similarly, Section 54.313(a)(2) of the Commission Rules requires ETCs to submit information regarding various network outages triggered by the requirements of this Rule. The Annual Progress Report, includes a description of upgrades to the Company’s network along with updated estimates regarding the Company’s proposed major constructions projections as further described and noted in its Annual Progress Report, including for example, updated estimated capital expenditures for each project and, if applicable, updated time frames for those projects that were planned to be completed by the end of calendar year 2015, along with a map that provides a pictorial depiction of such deployment plans, and how much federal universal service funding was received (the “Annual Progress Report Information”). The Network Outage Information reveals certain events experienced by the Company in calendar year 2015 where specific network functions were unavailable to the Company’s customers pursuant to the descriptions as identified in Section 54.313(a)(2).

The Company respectfully submits that its Progress Report Information and its Network Outage Information is competitively sensitive and is a “trade secret” which has been defined as “information which is used in one’s business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it.” *See* Restatement of Torts §757 (1939). The Progress Report Information represents the Company’s efforts to comply with the requirements of Section 54.313(a)(1) of the Commission’s Rules based on the Company’s collective experience, thought, analysis, and planning along with the Company’s opinion of market trends, conditions, technologies, and customer preferences arising out of, *inter alia*, the Company’s existing operations within the rural areas it serves in Nebraska. Just as would be the case for one of its competitors and that competitor’s experience, the cumulative effect of this effort affords the Company “an advantage over competitors” that do not have access to the information.

Disclosure of the Company’s Progress Report Information related to the existing and planned improvement and upgrade plans, time frames, and affected customers and census blocks would provide competitors with the views and insights of the Company and its business planning during period covered by this submission and those anticipated network upgrades and capabilities that the Company believes, all things being equal, are necessary to meet its obligations under applicable Commission Rules, service commitments and efforts to retain customers. Improper public access to this Company information would enable existing and potential competitors to respond preemptively and unfairly by utilizing internal Company information that is guarded closely and not disclosed to third parties during the normal and

Ms. Marlene H. Dortch, Secretary
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ordinary course of business. Public access to the Company's Progress Report Information, therefore, would enable competitors to tailor marketing and/or entry strategies in a manner that would not be possible but for the provision of the Progress Report Information to the Commission. Thus, competitors would be able to target and/or modify their competitive service plans to take advantage of those locations where projects are not underway, or plan for competitive offerings in those areas where the Company's plans are known but for which the competitor had no plans previously.

Similarly, the Company's provision of Network Outage Information is information not readily available to the public or to competitors, is filed with the Commission and treated by the Commission as presumptively confidential. *See* 47 C.F.R. § 4.2. The Network Outage Information reveals situations where the Company's efforts to provide continued quality service was compromised and would allow insights into the responsiveness of ability of the Company to respond to temporary network outages. In this regard, competitors could obtain insights into the operations of the Company and its capability to respond to service area issues. Such knowledge, in turn, would allow competitors to target and/or modify their competitive service plans to mirror or possibly exceed the Company's capabilities not previously anticipated by the competitor as necessary.

With respect to both the Progress Plan Information and the Network Outage Information, these results, in the Company's view, would be inconsistent with the competitive goals of the 1996 revisions to the Communications Act of 1934, as amended (the "Act"). In general, competition is the "effort of two or more parties, acting independently, to secure the business of a third party by the offer of the most favorable terms." Black's Law Dictionary, Sixth Ed. West Publishing Co., St. Paul, MN (1991). By contrast, utilization of trade secrets by a firm in order to gain market share would ignore a fundamental principle of competition, specifically, the pursuit of consumers by two or more parties "acting independently." Disclosure of the trade secrets and the use by competitors of the confidential information contained in the Progress Report Information and the Network Outage Information would be inconsistent with the competitive objectives of the Act, as the disclosure would allow access to the Company's Progress Report Information and Network Outage Information that would not otherwise be independently available to one of its competitors.

Accordingly, pursuant to Section 0.459(b) of the Commission's rules, the following is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought.

The Company seeks confidential treatment of the Progress Report Plan Information regarding:

Ms. Marlene H. Dortch, Secretary
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Page 5

- A) The time frames for initiation and completion of improvements and upgrades to facilities in the proposed projects;
- B) Maps at the census block level depicting broadband availability and schedule of the number of estimated affected population and census blocks associated with each project.
- C) Financial information related to capital expense / operating expense
- D) Information relative to the company's use of universal service support dollars.

The Company also seeks confidential treatment of the Network Outage Information as disclosed in response to Line 220 of the FCC Form 481.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.

The Progress Report Information is submitted as a result of the requirements of Section 54.313(a)(1) of the Commission's Rules and Section 254 of the Act, as required by FCC Form 481. *See, e.g., In the Matter of Connect America Fund, et al., Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 10-90 *et al.*, 26 FCC Rcd 17663 (2011), *aff'd* In Re: FCC 11-161, 753 F.3d 1015 (10th Cir. 2014); *see also* 47 C.F.R. §54.313. The Network Outage Information is submitted as a result of the requirements of Section 54.313(a)(2) of the Commission's Rules and Section 254 of the Act, as required by the Commission with respect to the submission of the FCC Form 481.

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

The Progress Report Information is commercial and financial information, and contains trade secrets in that it reveals the Company's planned timing of, expenditures associated with, and customer impacts arising from its network upgrade plans for provisioning broadband services. This information is highly confidential because it describes the Company's proposed plans for the network, including: a good faith estimated schedule for such projects; the wire centers included in such projects; an explanation of projects known or scheduled to be underway in the future, as well as planned construction projects currently underway; the estimated cost of the projects; and the estimated population and census blocks to be affected by the project. The Progress Report also provides milestone updates as of June 1, 2016.

Once the requirement to complete Line 220 of the FCC Form 481 is triggered, as is the case with the Company, the Company respectfully submits that the Network Outage Information

Ms. Marlene H. Dortch, Secretary
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Page 6

requires the disclosure of trade secret and confidential information regarding, by way of example, the time and date of a reportable outage, a description of what triggered the outage, the time when the outage was resolved, the number of affected customers, the impact on 911 facilities (if any), the resolution and preventive steps taken by the Company to avoid a future outage.

(4) Explanation of the degree to which the information concerns a service that is subject to competition.

Both the Progress Plan Information and the Network Outage Information relates to the Company's network, with the former information relating to the planning and the status of on-going networks deployments required for the provision for local exchange service and the provision of broadband internet access service, which are both competitive services. So too, this same network is implicated by the disclosure of the Network Outage Information as required by Section 54.313(a)(2) of the Commission's Rules. In this regard, fixed wireless providers are currently providing broadband services in portions of the Company's Study Area

(5) Explanation of how disclosure of the information could result in substantial competitive harm.

In addition to those points raised in response to Subsection 1, above, disclosure of the Progress Report Information could result in substantial competitive harm by revealing to competitors the nature and extent of the Company's business plans to continue to provide the quality of voice service and broadband internet access service over its network that has enabled the Company to retain its existing customer base, and the current status of planned network upgrades first disclosed last year. This information, therefore, would enable competitors to unfairly discover the Company's existing proposed plans and current status with respect to those projects it has decided would be necessary to ensure continued high quality service throughout its service area and its requirements under applicable Commission Rules. Likewise, the disclosure of the Network Outage Information would provide insights into the Company's ability to address certain customer-affecting network events and the responsiveness of the Company to address those events in a timely fashion.

As explained and described above, the information submitted describes the Company's confidential business plans and operational capabilities based on the facts that the Company has today. Thus, disclosure of the Progress Report Information would provide existing and potential competitors of the Company keen insights into the Company's infrastructure plans based on existing circumstances, as well as the ability to address certain types of network outages in order to minimize customers' inability to have continuous network and service capabilities. These types of insights, in turn, would enable such competitor to craft or update its business plan to either target those areas where it believes the growth of market share can occur vis-à-vis the

Ms. Marlene H. Dortch, Secretary
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Company's non-upgraded facilities or to target its own investment or operational capabilities in those areas where, but for the Company's Progress Report Information or Network Outage Information, the competitor would not have seen the need to invest or improve its operations to retain or gain market share.

In such a circumstance, the competitor would be able to "game" the market place by understanding where its competitor – the Company – believes network improvement dollars are best spent as well as the timing of such decision and, with respect to the Network Outage Information, the level of resource commitment and service outage capability that would not otherwise be known. Such results do not encourage fair competition nor support fair competition. Rather, such action would undermine competition by enabling competitors to acquire competitively sensitive information of the Company. That acquisition of information, in turn, would improperly assist that competitor's effort to gain customers not as a result of its own decision making and capabilities but as a result of access to commercially sensitive information from the Company that reflects the Company's decision making and capabilities.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

The Progress Report Information and the Network Outage Information as submitted by the Company are each generally protected to prevent unauthorized disclosure. Disclosure of this information is limited solely to internal corporate discussions and, where necessary, disclosure to vendors or others whose participation is necessary to plan or implement such projects (and such disclosure is made subject to a professional confidentiality obligation).

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

The Progress Report Information and the Network Outage Information is not published, nor provided to the public, nor included in any publicly-available documents or materials of the Company. The information has not been disclosed to third parties unless such disclosure is subject to a professional confidentiality obligation.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure.

The Company submits that the Progress Report Information and the Network Outage Information should be treated as confidential on a permanent and on-going basis. The Progress Report Information discloses and reveals the Company's strategy, and provides competitively sensitive information in that it reveals the Company's approach to and status of network

Ms. Marlene H. Dortch, Secretary
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upgrades and improvements. The information should be treated as confidential even after the five-year period described in the Progress Report Information has passed since, to the extent exogenous events or changed business plans alter the schedules or outcome of the network upgrade plans described therein, those descriptions and plans may be wholly relevant and applicable in a successive time period.

So too, the Company's Network Outage Information should also be treated as confidential on a permanent and on-going basis. The Network Outage Information discloses and reveals the Company's network related operational capabilities to address and resolve identified types of network outages using the reporting triggers found in Section 54.313(a)(2). This information provides competitively sensitive information in that it reveals the Company's approach to and status of the Company's commitment to its customers to provide uninterrupted, high quality telecommunication services. The information should be treated as confidential even after the five-year period described in the Progress Report Information has passed since, to the extent exogenous events occur providing a further track record of the Company's capabilities, a trend analysis of such responsiveness could be established providing additional inappropriate insights to competitors of the Company's operations and capabilities. Thus, the current Network Outage Information may be wholly relevant and applicable in a successive time period.

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.

The requested treatment of this information as confidential and proprietary by the Commission is consistent with the Commission's policies in addressing other submissions that contained competitively sensitive information.

For example, with respect to the Progress Plan Information, the Commission recognized in the *Local Competition and Broadband Reporting, Report and Order*, CC Docket No. 99-301, FCC 00-114 (rel. Mar. 30, 2000) that information submitted with Form 477 (Local Telephone Competition/Broadband Reporting) (the "Form") implicated concerns related to the disclosure of competitively sensitive data. The Form requires information regarding the type of technology used to deliver broadband services, including total connection to end-users, information transfer rates, and an estimate of the percentage of residential end-user premises in the provider's service area to which the provider's broadband connections could be provided using installed distribution facilities. The Commission requires the information because it "conclude[d] that the answers to these questions are necessary to describe and understand the state of competition for local telephone services and the deployment of broadband services in diverse areas of the nation." *Id.* at ¶62.

At the same time, however, the Commission also recognized "concern over the potential for competitive harm that release of the gathered data could cause." *Id.* at ¶88. While stating

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
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that it was not “making a prospective decision about whether these data elements would satisfy the Commission’s standard for non-disclosure,” the Commission also stated that it would “not . . . publish in our publicly available reports individual provider-filed data for the broadband (Part 1) portion of the Form, *even where providers do not seek non-disclosure of this data.*” *Id.* at ¶91 (emphasis added). In fact, rather than require carriers to submit a detailed and specialized request with the Form, the Commission offered filers a “check-box” on the Form in order to “mak[e] it easier for providers to request confidential treatment of their data.” *Id.* at ¶90. This same approach – the checking of a box to assert confidentiality – is also available to filers of the financial information required by the submission of the FCC’s FCC Form 499-A and FCC Form 499-Q. *See* 2016 FCC Form 499-A, line 605 and 2015 Telecommunications Reporting Worksheet Instructions (FCC Form 499-A), Form 499-A at 46; *see also* FCC Form 499-Q, line 121 and Telecommunications Reporting Worksheet, FCC Form 499-Q (2016) Instructions for Completing the Quarterly Worksheet for Filing Contributions to Universal Service Support Mechanisms at 19.

Likewise, and as noted above, when submitting similar outage information, the Commission’s Rules provide for presumptive confidential treatment. *See* 47 C.F.R. ¶ 4.2. Line 220 seeks the applicable “NORS” file numbers associated with the Part 4 electronic network outage reporting system contemplated by the Commissions’ Rules. *See, e.g.,* 47 C.F.R. § 4.11; *see also* <https://www.fcc.gov/nors/outage/>. The Company respectfully submits that similar treatment of its Network Outage Information encourages consistent treatment across classes of similar information, a result clearly advancing the public interest in proper reporting.

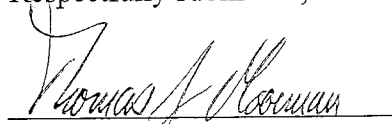
The Company respectfully submits that similar concerns that the Commission has recognized previously regarding the competitively-sensitive nature of carrier data are applicable here; the data related to current and future plans of Company found in the Progress Plan Information reflects construction projects reflected in the Progress Report Plan is at least as, if not more, competitively-sensitive than the type submitted in other FCC forms. For example, unlike the Form 477 Information which describes current broadband capabilities and FCC Form 499-A regarding prior year revenues and FCC Form 499-Q regarding prior quarter and projected quarter revenues, the Progress Report Plan also reflects the Company’s reasoned business decision making as to future actions and the status of them that it believes are necessary to ensure quality service over its network. Similarly, the Commission already requires similar information as that provided regarding the Network Outage Information to be filed as confidential outside the scope of the FCC Form 481 filing. Consistent confidential treatment of very similar information as filed in the FCC Form 481 submission is only logical, appropriate and otherwise consistent with the public interest.

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
June 27, 2016
Page 10

Relief Requested

Therefore, for all of the reasons stated herein, the Company respectfully requests that the Company's Section 54.313(f)(2) financial information be treated as confidential under the requirements of the Protective Order. The Company also respectfully requests that the Commission to recognize that the Progress Report Information and Network Outage Information for which confidential treatment is requested, as described above, be withheld from public inspection. Pursuant to the requirements of the Protective Order and Section 0.459(a) of the Commission's Rules, the materials to which this request applies are submitted physically separated from any materials to which the request does not apply and are marked "REDACTED - FOR PUBLIC INSPECTION". Moreover, pages containing Section 54.313(f)(2) confidential information are marked "CONFIDENTIAL INFORMATION — SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION." Further, pages containing information regarding the Company's Progress Report Information and Network Outage Information are marked "CONFIDENTIAL".

Respectfully submitted,



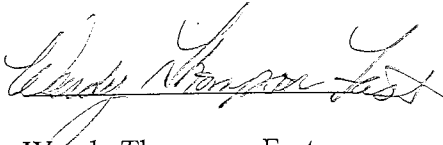
Thomas J. Moorman
James A. Overcash
Counsel for
Curtis Telephone Company

Attachment

cc: Wendy Thompson Fast

DECLARATION

I, Wendy Thompson Fast, President of Curtis Telephone Company (the "Company"), do hereby declare under penalties of perjury that I have read the foregoing request for confidential treatment and the information contained therein regarding the Company is true and accurate to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Wendy Thompson Fast", written over a horizontal line.

Wendy Thompson Fast
President

Date: 6/27/16



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CONFIRMATION

Congratulations. Your filing has been successfully certified.

Filing 1 was successfully certified on Wed 15 Jun 16 04:56:56 PM EDT by wfast@nebnet.net .

SAC : 371536

498 ID : 143002166

Carrier Name : CURTIS TEL CO

Program Year : 2017

A confirmation email will be sent to the email address on record for your user ID. Please email USAC at HCCERTS@USAC.ORG if you do not receive this email within 24 hours.

Please take this quick survey and give us your thoughts! Your feedback will help improve the filing process. [Take Survey](#)

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**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Julie Steinhoff
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4024892728 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jsteinhoff@nebnet.net
Form Type		54.313 and 54.422

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net



(yes / no)



(yes / no)

<110> Has your company received its ETC certification from the FCC?
if your answer to Line <110> is yes, do you have an existing §54.202(a) "5
year plan" filed with the FCC?

if your answer to Line <111> is yes, please file a progress report, on line
<112> delineating the status of your company's existing § 54.202(a) "5 year
plan" on file with the FCC, as it relates to your provision of voice telephony
service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years,
your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a
CETC which only receives frozen support, your progress report is only
required to address voice telephony service.

371536nell12.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm
that the attached document(s), on line 112, contains a progress report on its five-year
service quality improvement plan pursuant to §54.202(a). The information shall be
submitted at the wire center level or census block as appropriate.

Yes
Yes
Yes
Yes
Yes
No

<113> Maps detailing progress towards meeting plan targets
<114> Report how much universal service (USF) support was received
<115> How much (USF) was used to improve service quality and how support was used to improve service quality
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
<118> Provide an explanation of network improvement targets not met
in the prior calendar year.

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<210> For the prior calendar year, were there any reportable voice service outages?

-- See attached worksheet --

(300) Unfulfilled Service Request Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	371536	
<015> Study Area Name	CURTIS TEL CO	
<020> Program Year	2017	
<030> Contact Name - Person USAC should contact regarding this data	Julie Steinhoff	
<035> Contact Telephone Number - Number of person identified in data line <030>	402492728 ext.	
<038> Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net	
<300> Unfulfilled service request (voice)	0	
<310> Detail on attempts (voice)	Name of Attached Document	
<320> Unfulfilled service request (broadband)	0	
<330> Detail on attempts (broadband)	Name of Attached Document	

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0886/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

{500} Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

FCC Form 481
OMB Control No. 3060-0985/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
		371536ne510 .pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

(600) Functionality in Emergency Situations Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	371536ne610.pdf

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net
<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	19.95

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data line <030>	Julie Steinhoff 4024892728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	402492728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net
<900>	Does the filing entity offer tribal land services? (Y/N)	

No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select Yes or No or Not Applicable

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers**Lifeline****Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 371536
 <015> Study Area Name CURTIS TEL CO
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data Julie Steinhoff
 <035> Contact Telephone Number - Number of person identified in data line <030> 4024892728 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> jsteinhoff@nebnet.net

371536nel210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website HTTP www.nebnet.net

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation		FCC Form 481	
Data Collection Form		OMB Control No. 3060-0386/OMB Control No. 3060-0819	
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		July 2013	
<010>	Study Area Code	371536	
<015>	Study Area Name	CURTIS TEL CO	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff	
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net	

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support
- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(iii)

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0886/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)	
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No) <input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No) <input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No) <input type="radio"/> <input checked="" type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input checked="" type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input checked="" type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.	<input checked="" type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued)

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	371536
<015> Study Area Name	CURTIS TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035> Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nelnet.net

Financial Data Summary

(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service (TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

Redacted for Public Inspection

(4005) Rural Broadband Experiment Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024852728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	371536
<015> Study Area Name	CURTIS TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035> Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: CURTIS TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/16/2016
Printed name of Authorized Officer: Wendy Thompson Fast	
Title or position of Authorized Officer: President	
Telephone number of Authorized Officer: 4024892728 ext.	
Study Area Code of Reporting Carrier: 371536	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	371536
<015> Study Area Name	CURTIS TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035> Contact Telephone Number - Number of person identified in data line <030>	4024892728 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

371536

CURTIS TEL CO

2017

Julie Steinhoff

4024892720 ext.

istehoff@nebnet.net

<210> For the prior calendar year, were there any reportable voice service outages? Yes

<220>

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024692728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net

	Residential Local Service Charge Effective Date
<701>	Single State-wide Residential Local Service Charge
<702>	

1/1/2016	19.95
----------	-------

<703>

[illegible]

<010>	Study Area Code	371536
<015>	Study Area Name	CURTIS TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Steinhoff
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024897728 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsteinhoff@nebnet.net

[illegible]

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

Overview

The Company provides this Annual Progress Report pursuant to 47 C.F.R. 54.313 to report on its five-year service quality improvement plan prepared pursuant to 54.202(a), including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve service quality, coverage, or capacity, and an explanation (if applicable) regarding any network improvement targets that have not been fulfilled in the prior calendar year.

The Company provided its 5-year plan based upon then-current and reasonably anticipated circumstances. These circumstances, by way of example, included the level of recovery and revenue that the Company believed, in good faith, it had projected in each of the plan years. These projections were based on the Company's understanding of the regulatory regimes, Universal Service programs and intercarrier compensation requirements applicable to its operations. As the Company noted, should these anticipated circumstances change or the results of such programs and requirements differ from the Company's projections, the Company's plans may change. This same analytical construct was used by the Company in developing this Annual Progress Report and the same caveats are applicable to the good faith estimates provided.

The projected planned capital improvement (CapEx) over 5 years for the Company is approximately [REDACTED]. For calendar year 2014, and in addition to the capital improvements planned in the wire centers to provide access to facilities that allow subscribers to have service meeting the 4/1 Mbps standard, the Company incurred approximately [REDACTED] in depreciation expense and approximately [REDACTED] in on-going maintenance and operating expenses (OpEx). These types of expenses will be incurred by the Company during the 2015 to 2019 calendar years.

Annual Progress Reports:

Progress Report #1: For areas with Planned Capital Improvements in Year 2015 from initial 5-Year Plan filed and submitted in June, 2014 by the Company in response to July 1, 2014 deadline

In its initial 5-year plan, the Company described its overall proposed improvements throughout the entirety of its service area to provide subscribers broadband service meeting the broadband standards based on proposed improvements and/or upgrades to the network by the end of calendar year 2019. In this Annual Progress Report, the Company updates that information related to specific areas contained in the [REDACTED] (exchange) which is the target area for current and planned upgrades for 2015. The Company recognizes that the Commission has raised the broadband standard to 10 Mbps downstream/1 Mbps upstream and the Company is currently evaluating how best to achieve this standard. However, the Company believes that the improvements outlined herein for calendar year 2015 will help achieve the revised standard for broadband. For those locations currently not 10/1 capable, the Company will attempt to meet a request for such service based on the "reasonable request" standard established by the Commission.

- [REDACTED] of construction has been completed as of [REDACTED]
- Estimated completion date for this project is [REDACTED]

Progress Report #2: For areas with Planned Capital Improvements in Year 2016 from initial 5-Year Plan filed and submitted in June, 2014 by the Company in response to July 1, 2014 deadline

- In its initial 5-year plan, the Company described its overall proposed improvements throughout the entirety of its service area to provide subscribers broadband service meeting the broadband standards based on proposed improvements and/or upgrades to the network by the end of calendar year 2019. In this Annual Progress Report, the Company updates that information related to specific areas contained in the [REDACTED] (exchange) which is the target area for current and planned upgrades for 2016. The Company recognizes that the Commission has raised the broadband standard to 10 Mbps downstream/1 Mbps upstream and the Company is currently evaluating how best to achieve this standard. However, the Company believes that the improvements outlined herein for calendar year 2016 will help achieve the revised standard for broadband. For those locations currently not 10/1 capable, the Company will attempt to meet a request for such service based on the “reasonable request” standard established by the Commission.
- Preliminary “planning” has [REDACTED]
- Construction is anticipated to start [REDACTED]
- Approximately [REDACTED] of outside plant materials has been ordered and received.
- Approximately [REDACTED] of central office equipment has been ordered.
- [REDACTED] estimated completion date.

FCC Form 481 Line 113: Maps detailing progress towards meeting plan targets

The maps contained in Appendix A-1 show census blocks in the exchange (or exchange area) with locations capable of 4/1 broadband service as of June 1, 2016, with locations capable of 10/1 broadband service as of June 1, 2016, and census blocks where planned capital improvements are scheduled in year 2016.

FCC Form 481 Line 114: Report how much universal service (USF) support was received.

Table 1 below contains the amount of universal service dollars booked by the Company for (A) Year 2015, (B) January through April (most recent month available prior to preparing filing) 2016, and (C) estimated portion of USF dollars attributable to capital expense/operating expense

The methodology used to develop Table 1 is a function of the Company’s investment levels and maintenance and operations expense levels for 2015 as further explained in Table 2. The Company has used these categories based on the applicable account balances to which federal USF dollars are intended to be used, *i.e.*, those accounts that reflect the Company’s costs for provisioning, maintaining and upgrading of facilities and services associated with the Company’s provision of universal service. In doing so, and in the absence of Commission direction to the

contrary, the Company has developed what it believes to be a reasonable, good faith methodology regarding how it should allocated federal USF disbursements.

Table 1 – Universal Service Support \$

Curtis Telephone (371536)	Total USF	Est. USF \$'s attributable to:	
		Capital Exp*	Operating Exp*
2015 Jan-Dec Booked Amt	● [REDACTED]	● [REDACTED]	● [REDACTED]
Jan 2016 Booked Amt.	● [REDACTED]		
Feb	● [REDACTED]		
Mar	● [REDACTED]		
Apr	● [REDACTED]		
May	● [REDACTED]		
Total Jan-May 2016	● [REDACTED]	● [REDACTED]	● [REDACTED]

*- derived using Table 2 percentages on lines 22 and 23.

Table 2, below contains expenditures for provision maintenance and upgrading of facilities and services supported by federal universal service funding. The estimated percentages contained in Table 2 were used in response to Lines 115, 116, and 117 of the FCC Form 481.

Table 2

		SAC 371536 2015 Amt.
1	Total Network Support Expense	\$ [REDACTED]
2	Total General Support Expenses	\$ [REDACTED]
3	Total Central Office Switching Expense	\$ [REDACTED]
4	Total Central Office Transmission Expense	\$ [REDACTED]
5	Total Cable and Wire Facilities Expenses	\$ [REDACTED]
6	Total Depreciation & Amortization Expenses	\$ [REDACTED]
7	Total Expenses Attributable to Capital	\$ [REDACTED]
8	Total Network Operations Expenses	\$ [REDACTED]
9	Total Customer Operations Expense	\$ [REDACTED]
10	Total Corporate Operations Expenses	\$ [REDACTED]
11	Total Expenses Attributable to Operating	\$ [REDACTED]
12	Total Capital and Operating Expenses	\$ [REDACTED]
13	Additions CapEx	
14	Total Central Office - Switching	\$ [REDACTED]
15	Total Central Office - Transmission	\$ [REDACTED]
16	Total Cable and Wire Facilities Assets	\$ [REDACTED]
17	Total Additions	\$ [REDACTED]
18	On-going Maint/Oper Exp	\$ [REDACTED]
19	Capex Additions + Depr	\$ [REDACTED]
20	All Expenses excl Depr	\$ [REDACTED]
21	Total	\$ [REDACTED]
22	% attributable to Capital expenditures	[REDACTED]
23	% attributable to Operating Exp	[REDACTED]
24	2015 \$ used for Service Quality	\$ [REDACTED]
25	2015 \$ used for Service Coverage	\$ [REDACTED]
26	2015 \$ used for Service Capacity	\$ [REDACTED]
		\$ [REDACTED]
27	Est. % of USF used for Service Quality	[REDACTED]
28	Est. % of USF used for Service Coverage	[REDACTED]
29	Est.% of USF used for Service Capacity	[REDACTED]

FCC Form 481 Line 115: How much (USF) was used to improve service quality and how support was used to improve service quality.

The Company estimates that approximately [REDACTED] or [REDACTED] of 2015 USF dollars it received was used to improve service *quality*. The Company submits that, for its operations, service quality is reasonably considered to be related to the Company's maintenance and operations expenses associated with its network. The Company submits that these expense categories reasonably reflect what the Company undertakes to meet those network quality objectives and capacity requirements necessary to serve and meet the needs of its customers. In the absence of Commission direction to the contrary, the Company has allocated [REDACTED] of its maintenance and operations expenses to this "service quality" category and [REDACTED] to the service capacity category (FCC Form 481 Line 117, below). Based on the Company's objective of meeting its customer's telecommunication services and advanced telecommunication service needs, the Company believes that the estimated percent of universal service funding received in 2015 that was spent on maintenance and operations represent a reasonable and good faith estimate of the percent of universal service funding that has and will be used to improve service quality in 2016.

FCC Form 481 Line 116: How much (USF) was used to improve service coverage and how support was used to improve service coverage.

The Company estimates that approximately [REDACTED] or [REDACTED] of 2015 USF dollars it received was used to improve service *coverage* in those wire centers/exchanges where the Company provides telecommunication services and advanced telecommunications services. The Company submits that, for its operation, service coverage is reasonably related to the Company's capital expenditures (*i.e.*, new network upgrades and deployments, and the overall depreciation expense) as those investments are related to the Company's ability to extend (and thus improve) service coverage from that which the Company's network was previously able to provide. As a result of the expansion and network deployments that the Company had undertaken and continued to undertake as a result of its 2015 expenditures, as of June 1, 2016, [REDACTED] of households have access to 4/1 or higher broadband service. The Company believes that the estimated percent of universal service funding received in 2014 used for network upgrades (including depreciation) 2015 represent a reasonable and good faith estimate of the percent of universal service funding that has and will be used to improve service coverage in 2016.

FCC Form 481 Line 117: How much (USF) was used to improve service capacity and how support was used to improve service capacity.

The Company estimates that approximately [REDACTED] or [REDACTED] of 2015 USF dollars it received was used to improve service *capacity* in wire centers/exchanges where the company provides telecommunication services and advanced telecommunications services. For the reasons stated in response to its explanation regarding FCC Form 481 Line 115, above, the Company believes that the estimated percent of universal service funding received in 2015 that was that was spent on maintenance and operations represent a reasonable and good faith estimate of the percent of universal service funding that has and will be used to improve service capacity in 2016.

Appendix A-1

Exchange Maps Detailing Progress for Improvements in 2016

REDACTED MATERIAL

Redacted pages 6-7 of original.

Curtis Telephone Company, Inc.

Certification of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

Service Quality Standards

The Company:

- Provides voice grade access to the public switched network.
- Provides flat rated local exchange service with no additional charge to end users.
- Provides access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911.
- Provides toll blocking and toll limitation services.
- Advertises the availability of its services and the charges using media of general distribution and on its website.
- Maintains a business office providing customers with access to a customer service representative either in person or via a local telephone call or toll-free telephone number during normal business hours.
- Directs after hour calls to the Company's help desk.
- Directs trouble reports to the on-call technician.
- Tracks all service orders to ensure they are completed in a timely manner.
- Measures its service connection and service interruption performance on a regular basis.
- Trains employees to:
 - Answer all incoming calls promptly.
 - Respond to all inquiries for information promptly and courteously.
 - Investigate thoroughly all customer complaints and handle appropriately according to the Company's guidelines for resolution of customer complaints.
 - Be knowledgeable about products and service offerings so they can assist the customer with selecting the best service option.
- Has a process for periodic inspection, testing and preventive maintenance of its equipment to permit the rendering of safe, adequate and continuous service at all times.

Consumer Protection Rules

The Company has established operating procedures designed to facilitate compliance with applicable consumer protection rules which include compliance with the Customer Proprietary Network Information (CPNI) rules. The operating procedures include:

- Appointment of a compliance officer.
- A manual detailing the specific procedures for protecting consumer information.
- Employee training on an annual basis.
- A disciplinary process for improper use of consumer information.

Curtis Telephone Company, Inc.

Functionality in Emergency Situations

Back-Up Power

The sole central office/exchange in the company is equipped with a propane/natural gas powered generator which is capable of providing a minimum of 7 days' of emergency back-up power. Additionally, the central office is also equipped with 12 hours of emergency DC battery backup. The initiation of the Company's battery back-up capability is triggered when the network identifies the existence of a loss of power. Finally, 100% of Digital Loop Carriers (DLCs) deployed in the field are equipped to provide 12 hours of emergency back-up power. The company also has access to approximately 36 portable standby generators that could be used throughout its network to provide emergency power.

Rerouting of Traffic around Damaged Facilities

The company operates a transport system where the main routes consist of a self-healing protected fiber optic ring with redundant facilities between all exchanges and alternate routing capability to meet point locations.

Traffic Spikes

The company's switching system and fiber based transport network is capable of managing traffic spikes within their network in emergency situations. Under normal operating conditions, switching system capacity is available to handle significant traffic spikes that may occur during emergency situations. The company's fiber optic transport network utilizes Ethernet technology with scalable intra-network trunking to handle traffic spikes during emergency situations.

Curtis Telephone Company, Inc.

Nebraska Telephone Assistance Program Terms and Conditions

Nebraska Telephone Assistance Program

The Nebraska Telephone Assistance Program (NTAP) is available for qualifying customers of Curtis Telephone Company, Inc. NTAP assistance reduces the cost of basic, monthly local telephone service. Eligible consumers can receive up to \$12.75 per month in discounts. In addition, the Federal Universal Service Charge is not assessed to consumers participating in NTAP. Toll Blocking prevents the placement of all long distance calls for which a subscriber would be charged. Toll blocking is available to eligible consumers at no cost. Also, by choosing this option, consumers are usually not charged a deposit.

NTAP is administered by the Nebraska Public Service Commission.

NTAP Eligibility Information

Program Based Eligibility

To qualify for NTAP, subscribers must either have an income that is at or below 135% of the Federal Poverty Guidelines, or the subscriber, one or more of the subscriber's dependents, or the subscriber's household must receive benefits from one of the following assistance programs:

- Low-Income Home Energy Assistance Program (LIHEAP)
- Federal Public Housing Assistance (Section 8)
- Medicaid
- Children's Health Insurance Program/Kids Connection (SAM, MAC or EMAC)
- Supplemental Nutrition Assistance Program (SNAP); (formerly the Food Stamps Program)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- National School Lunch Program Free Lunch program
- State assistance programs (if applicable)

To receive an NTAP application, contact your local *Health and Human Services* agency caseworker or the *Nebraska Public Service Commission*, 1200 N Street, Suite 300, PO Box 94927, Lincoln, NE 68508-4927, Phone: 402-471-3101, Toll Free: 1-800-526-0017 or <https://ntap.gisworkshop.com/>

NTAP applicants must present documentation demonstrating eligibility either through participation in one of the qualifying federal assistance programs or through income-based means.

Acceptable documentation of program-based eligibility includes: current or prior year's statement of benefits from a qualifying state, federal or Tribal program; notice letter of participation in a qualifying state, federal or Tribal program; program participation documents; or another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.

Income Based Eligibility

In addition, consumers are eligible for NTAP if their household income is at or below 135% of the federal poverty guidelines.

2016 Federal Poverty Guidelines – 135%

Household Size	48 Contiguous States and D.C.
1	\$16,038
2	\$21,627
3	\$27,216
4	\$32,805
5	\$38,394
6	\$43,983
7	\$49,586
8	\$55,202
For each additional person, add	\$5,616

Acceptable documentation of income eligibility includes: prior year's state, federal or Tribal tax return; current income statement from an employer or paycheck stub; social security statement of benefits; Veterans Administration statement of benefits; retirement/pension statement of benefits; unemployment/workmen's compensation statement of benefits; federal or Tribal notice of letter participating in General Assistance; or a divorce decree or child support award or other official document containing income information.

Tribal Eligibility

A subscriber who lives on Tribal lands and is an eligible resident of Tribal lands is eligible for Tribal Lifeline service or Tribal Link Up if the subscriber, one or more of the subscriber's dependents, or the subscriber's household participates in any of the above-listed qualifying assistance programs or one of the following Tribal-specific federal assistance programs: Bureau of Indian Affairs General Assistance; Tribally Administered Temporary Assistance for Needy Families; Head Start (if income eligibility criteria are met); or the Food Distribution Program on Indian Reservations (FDPIR). Tribal subscribers may also qualify if the household income is at or below 135% of the Federal Poverty Guidelines.

Tribal subscribers should contact Curtis Telephone Company, Inc. for additional information on Tribal Lifeline and Tribal Link Up.

Numbers of Minutes-of-Use Provided as Part of NTAP Program Service

Curtis Telephone Company, Inc. Voice NTAP service includes unlimited local minutes-of-use within the toll-free calling area. Curtis Telephone Company, Inc. Voice NTAP Plan does not include any free minutes-of-use for toll. Toll is billed at the standard toll rate depending on which interexchange carrier the consumer subscribes to for toll service. As part of the NTAP service, Toll blocking is available to eligible consumers at no cost.

Rates

Subscribers may receive the NTAP credit on any type or grade of local service, including bundled services that are normally offered by Curtis Telephone Company, Inc. Advertised rates do not include any applicable taxes or surcharges.

Recertification of NTAP Eligibility

NTAP recipients are required to recertify their eligibility annually. Failure to properly recertify a recipient's continued eligibility for NTAP will result in termination of the NTAP recipient's monthly NTAP discount and de-enrollment from NTAP.

Additional NTAP Program Information

NTAP is limited to one benefit per household, consisting of either wireline or wireless service. A household is defined as an individual or group of individuals who live together at the same address and share income and expenses. NTAP is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

371536ne3010.pdf
FCC Form 481 – Line 3010

Progress Report of 5 Year Plan – Milestone Certification

To be in compliance with the Milestone Certification of providing upon a reasonable request broadband service at actual speeds of 4 Mbps downstream/1 Mbps upstream:

- Curtis Telephone Company provides broadband service with speeds of at least 4 Mbps downstream / 1 Mbps upstream in its service area and, therefore, certifies that it has taken steps to provide broadband service with actual speeds of 4M/1M, with latency suitable for real-time applications, including Voice over Internet Protocol.
- The Company provides usage capacity that is reasonably comparable to offerings in urban areas.
- The Company certifies that requests for such service are met within a reasonable amount of time.

LABENZ & ASSOCIATES LLC

Certified Public Accountants
4535 Normal Boulevard, Suite 195
Lincoln, Nebraska 68506

INDEPENDENT ACCOUNTANT'S REVIEW REPORT

To Management
The Combined Telephone Operations of Consolidated Companies, Inc.
Lincoln, Nebraska

We have reviewed the accompanying combined financial statements of The Combined Telephone Operations of Consolidated Companies, Inc., which comprise the combined balance sheets as of December 31, 2015 and 2014, and the related combined statements of income and comprehensive income, changes in stockholder's equity and cash flows for the years then ended, and the related notes to the combined financial statements. A review includes primarily applying analytical procedures to management's financial data and making inquiries of company management. A review is substantially less in scope than an audit, the objective of which is the expression of an opinion regarding the financial statements as a whole. Accordingly, we do not express such an opinion.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these combined financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of combined financial statements that are free from material misstatement whether due to fraud or error.

Accountant's Responsibility

Our responsibility is to conduct the review engagements in accordance with Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the AICPA. Those standards require us to perform procedures to obtain limited assurance as a basis for reporting whether we are aware of any material modifications that should be made to the combined financial statements for them to be in accordance with accounting principles generally accepted in the United States of America. We believe that the results of our procedures provide a reasonable basis for our conclusion.

Accountant's Conclusion

Based on our reviews, we are not aware of any material modifications that should be made to the accompanying combined financial statements in order for them to be in accordance with accounting principles generally accepted in the United States of America.

Supplementary Information

The supplementary information included in Schedules 1 - 4 is presented for purposes of additional analysis and is not a required part of the basic combined financial statements. The information is the representation of management. We have reviewed the information and, based on our review, we are not aware of any material modifications that should be made to the information in order for it to be in accordance with accounting principles generally accepted in the United States of America. We have not audited the information and, accordingly, do not express an opinion on such information.

Labenz & Associates LLC

Lincoln, Nebraska
March 7, 2016

371536ne3026.pdf

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(3005a) Operating Report for Privately-Held Rate of Return Carriers
Balance Sheet - Data Collection Form
 Page 1 of 3

FCC Form 481
 OMB Control No. 3060-0986
 July 2013

<010> Study Area Code
 <015> Study Area Name
 <020> Program Year
 <030> Contact Name - Person USAC should contact regarding this data
 <035> Contact Telephone Number - Number of person identified in data line <030>
 <039> Contact Telephone Email Address - Email Address of person identified in data line <030>

☒ Files as reviewed single company
☒ Filed as subsidiary of reviewed consolidated company
☒ Filed as audited single company
☒ Filed as audited consolidated company
☒ Filed as subsidiary of audited consolidated company

CERTIFICATION
 We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

[Signature]
 Date

ASSETS		BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY		BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS				CURRENT LIABILITIES			
1. Cash and Equivalents				25. Accounts Payable			
2. Cash-RUS Construction Fund				26. Notes Payable			
3. Affiliates:				27. Advance Billings and Payments			
a. Telecom, Accounts Receivable				28. Customer Deposits			
b. Other Accounts Receivable				29. Current Mat. L/T Debt			
c. Notes Receivable				30. Current Mat. L/T Debt-Rur. Dev.			
4. Non-Affiliates:				31. Current Mat.-Capital Leases			
a. Telecom, Accounts Receivable				32. Income Taxes Accrued			
b. Other Accounts Receivable				33. Other Taxes Accrued			
c. Notes Receivable				34. Other Current Liabilities			
5. Interest and Dividends Receivable				35. Total Current Liabilities (25 thru 34)			
6. Material-Regulated				LONG-TERM DEBT			
7. Material-Nonregulated				36. Funded Debt-RUS Notes			
8. Prepayments				37. Funded Debt-RTB Notes			
9. Other Current Assets				38. Funded Debt-FEB Notes			
10. Total Current Assets (1 Thru 9)				39. Funded Debt-Other			
NONCURRENT ASSETS				40. Funded Debt-Rural Develop. Loan			
11. Investment in Affiliated Companies				41. Premium (Discount) on L/T Debt			
a. Rural Development				42. Recaptured Debt			
b. Nonrural Development				43. Obligations Under Capital Lease			
Other Investments				44. Adv. From Affiliated Companies			
a. Rural Development				45. Other Long-Term Debt			
b. Nonrural Development				46. Total Long-Term Debt (36 thru 45)			
13. Nonregulated Investments				OTHER LIAB. & DEF. CREDITS			
14. Other Noncurrent Assets				47. Other Long-Term Liabilities			
15. Deferred Charges				48. Other Deferred Credits			
16. Jurisdictional Differences				49. Other Jurisdictional Differences			
17. Total Noncurrent Assets (11 thru 16)				50. Total Other Liabilities and Deferred Credits (47 thru 49)			
EQUITY				EQUITY			
PLANT, PROPERTY, AND EQUIPMENT				51. Cap. Stock Outstanding & Subscribed			
18. Telecom, Plant-in-Service				52. Additional Paid-in-Capital			
19. Property Held for Future Use				53. Treasury Stock			
20. Plant Under Construction				54. Membership and Cap. Certificates			
21. Plant Adj., Nonup. Plant & Goodwill				55. Other Capital			
22. Less Accumulated Depreciation				56. Patronage Capital Credits			
23. Net Plant (18 thru 21, less 22)				57. Retained Earnings or Margins			
				58. Total Equity (51 thru 57)			
24. TOTAL ASSETS (10+17+23)				59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)			

Redacted for Public Inspection

FCC Form 481
OMB Control No. 3050-0986
July 2013

<010> Study Area Code 371536
<015> Study Area Name Curtis Telephone Company, Inc.
<020> Program Year 2012
<030> Contact Name - Person USAC should contact regarding this data Julie Steinhoff
<035> Contact Telephone Number - Number of person identified in data line <030> 402-489-2729
<039> Contact Telephone Email Address - Email Address of person identified in data line <030> jsteinhoff@nbn.net

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS		PRIOR YEAR	THIS YEAR
ITEM			
1.	Local Network Services Revenues		
2.	Network Access Services Revenues		
3.	Long Distance Network Services Revenues		
4.	Carrier Billing and Collection Revenues		
5.	Miscellaneous Revenues		
6.	Uncollectible Revenues		
7.	Net Operating Revenues (1 thru 5 less 6)		
8.	Plant Specific Operations Expense		
9.	Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10.	Depreciation Expense		
11.	Amortization Expense		
12.	Customer Operations Expense		
13.	Corporate Operations Expense		
14.	Total Operating Expenses (8 thru 13)		
15.	Operating Income or Margins (7 less 14)		
16.	Other Operating Income and Expenses		
17.	State and Local Taxes		
18.	Federal Income Taxes		
19.	Other Taxes		
20.	Total Operating Taxes (17+18+19)		
21.	Net Operating Income or Margins (15+16-20)		
22.	Interest on Funded Debt		
23.	Interest Expense - Capital Leases		
24.	Other Interest Expense		
25.	Allowance for Funds Used During Construction		
26.	Total Fixed Charges (22+23+24-25)		
27.	Nonoperating Net Income		
28.	Extraordinary Items		
29.	Jurisdictional Differences		
30.	Nonregulated Net Income		
31.	Total Net Income or margins (21+27-28+29-30-26)		
32.	Total Taxes Based on Income		
33.	Retained Earnings or Margins Beginning-of-Year		
34.	Miscellaneous Credits Year-to-Date		
35.	Dividends Declared (Common)		
36.	Dividends Declared (Preferred)		
37.	Other Debits Year-to-Date		
38.	Transfers to Patronage Capital		
39.	Retained Earnings or Margins end-of-period [(31+33+34)-(35+36+37+38)]		
40.	Patronage Capital Beginning-of-Year		
41.	Transfers to Patronage Capital		
42.	Patronage Capital Credits Retired		
43.	Patronage Capital End-of-Year (40+41-42)		
44.	Annual Debt Service Payments		
45.	Cash Ratio [(14+20-10-11)/7]		
46.	Operating Accrual Ratio [(14+20+26)/7]		
47.	TIER [(31+26)/26]		
48.	DSCR [(31+26+10-11)/44]		

Redacted for Public Inspection

(3005c) Operating Report for Privately-Held Rate of Return Carriers
Balance Sheet - Data Collection Form
Page 3 of 3

FCC Form 481
OMB Control No. 3060-0986
July 2013

<010> Study Area Code
<015> Study Area Name
<020> Program Year
<030> Contact Name - Person USAC should contact regarding this data
<035> Contact Telephone Number - Number of person identified in data line <030>
<039> Contact Telephone Email Address - Email Address of person identified in data line <030>

371536
Curtis Telephone Company, Inc.
2017
Julie Steinhoff
402-489-2728
jsteinhoff@nebnet.net

PART C. STATEMENTS OF CASH FLOWS	
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	
2. Net Income	
CASH FLOWS FROM OPERATING ACTIVITIES	
3. Add: Depreciation	
4. Add: Amortization	
5. Other (Explain)	
6. Decrease/(Increase) in Accounts Receivable	
7. Decrease/(Increase) in Materials and Inventory	
8. Decrease/(Increase) in Prepayments and Deferred Charges	
9. Decrease/(Increase) in Other Current Assets	
10. Increase/(Decrease) in Accounts Payable	
11. Increase/(Decrease) in Advance Billings & Payments	
12. Increase/(Decrease) in Other Current Liabilities	
13. Net Cash Provided/(Used) by Operations	
CASH FLOWS FROM FINANCING ACTIVITIES	
14. Decrease/(Increase) in Notes Receivable	
15. Increase/(Decrease) in Notes Payable	
16. Increase/(Decrease) in Customer Deposits	
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	
18. Increase/(Decrease) in Other Liabilities & Deferred Credits	
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	
20. Less: Payment of Dividends	
21. Less: Patronage Capital Credits Retired	
22. Other (Explain)	
23. Net Cash Provided/(Used) by Financing Activities	
CASH FLOWS FROM INVESTING ACTIVITIES	
24. Net Capital Expenditures (Property, Plant & Equipment)	
25. Other Long-Term Investments	
26. Other Noncurrent Assets & Jurisdictional Differences	
27. Other (Explain)	
28. Net Cash Provided/(Used) by Investing Activities	
29. Net Increase/(Decrease) in Cash	
30. Ending Cash	

Officer Certification

The President of Consolidated Communications, Inc. states that:

1. Curtis Telephone Company, Inc. was not audited in the ordinary course of business for the preceding fiscal year.
2. To the best of my knowledge, the Balance Sheet (Form 3005a), Statements of Income and Retained Earnings or Margins (Form 3005b), and Statements of Cash Flows (Form 3005c) contained herein are complete, accurate, free from any misstatements and are not misleading in any respect.
3. The 2014 and 2015 fiscal year information contained in the above referenced schedules was reviewed at the Combined Telephone Operations of Consolidated Companies, Inc. by the Certified Public Accounting firm of Labenz & Associates LLC and the accompanying Independent Account's Review Report was presented to the Board of Directors by representatives of the CPA firm noted.

Nothing has come to my attention that would indicate any material change to the statements above.

Signature: Wendy Thompson Fast

Date: 6/14/16

Name: Wendy Thompson Fast

Title: President

Address: Consolidated Communications, Inc.
6900 Van Dorn St. Suite 21, Lincoln, NE 68506